Message

From: Densberger, Matthew@ARB [Matthew.Densberger@arb.ca.gov]

Sent: 9/12/2019 9:45:17 PM

To: Stauffer, Panah [Stauffer.Panah@epa.gov]

CC: Dave Conway [dconway@mariposacounty.org]; Xu, Jin@ARB [jin.xu@arb.ca.gov]; Smith, Noah

[SMITH.NOAH@EPA.GOV]

Subject: Mariposa County Emergency Episode Plan

Hello Panah,

CARB would like your input on how to best proceed with an aspect of Mariposa County's ozone EEP. Past emissions estimates from Yosemite boilers & generators were based on an aggregate emissions estimate with most sources being located within the Yosemite Valley. Is it acceptable to report the aggregate emissions (~6 tons/year NOx) in the highest emissions facilities table?

CARB staff is of the opinion that it is reasonable to list it as an aggregate estimate, as individually the sources would almost certainly be too small to list — and the county has very few sources to note. We believe that including an aggregate estimate with a footnote mentioning as such would be preferred. Additionally, if the county has no jurisdiction over the national park sources, a note/sentence should be included to inform as such (I'm guessing the district cannot require the park to shut down sources, but am not familiar enough with the laws to be certain).

We also are thinking, depending on how the district wants to take the plan, they could potentially include something short (couple sentences or quick paragraph) mentioning their very low ROG/NOx emissions and that permitted sources would contribute very little to an emergency episode, which would most likely be caused by transport and require requests/cooperation from surrounding areas – calling out the low emissions values in support of the statement. And maybe they already have this included... I haven't reviewed their plan yet.

Looking forward to your thinking. Also, I will be out of the office tomorrow and Monday; so, I've included Dave Conway in CC so Mariposa County can act upon any response more quickly.

Thanks and Best Regards,

Matthew Densberger

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